Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
RE: DELETE, DELETE, DELETE	)	Docket No. 25-133
	)	
	)	

COMMENTS OF THE LIFELINE COALITION

For over ten years, the Lifeline Coalition has advocated for affordable telecommunications and broadband services. The coalition represents a diverse array of public interest organizations[1] across the country united by the belief that every person in the United States should have access to affordable, high-quality communications services.

At the outset, we wish to note that the request for comments in this matter was not adopted by the vote of the Commission or by staff under identified delegated authority. It is not a notice of proposed rulemaking or a notice of inquiry. As such, any steps the Commission might take in response to comments that are filed must be adopted pursuant to FCC rules and the Administrative Procedure Act.

Delete Regulations that are Holding Back the Lifeline Program from Fulfilling its Mission

Connectivity is a cornerstone of modern life. It enables access to healthcare, education, employment, financial services, commerce, government programs, emergency response, and countless other essential functions. Yet for millions of Americans, the cost of phone and internet service remains a barrier they cannot afford to overcome.[2]

The Lifeline Program addresses this challenge by making connectivity more affordable. Through monthly discounts on phone and internet service, Lifeline helps ensure that everyone—regardless of income—can stay connected. In every state, affordability is the leading reason households remain offline,[3] making Lifeline one of the FCC's most effective tools to close the digital divide.

With the expiration of the Affordable Connectivity Program, millions of households lost the support they relied on to access the internet.[4] Lifeline must now rise to meet this urgent need. To do so, the program must be made more accessible, more flexible, and more robust while preserving integrity and reducing administrative burdens. To that end, we respectfully urge the Commission to adopt the following proposals:

1. **Delete the Sunset of Support for Voice-Only Services.** The Commission should reverse its proposal to end support for voice-only phone service under Lifeline. Many vulnerable populations—especially seniors and those in rural areas—continue to rely on traditional voice services for essential communication, including access to emergency services. Ending support for voice-only plans would reduce the program's flexibility and leave many participants without a reliable option. Preserving this support ensures Lifeline

[1] Members include Access Humboldt, Benton Institute for Broadband & Society, Common Sense Media, Everyone On, National Digital Inclusion Alliance, and many other public interest organizations.
[2] John B. Horrigan, PhD, and Everyone On: Affordability and the Digital Divide (2021)
[3] Kelly Wert, Pew: Every State Identifies Affordability as Primary Barrier to Closing Digital Divide (2024)
[4] John B. Horrigan, PhD, Benton Institute: One More Thing: The ACP Boosted Rural Adoption and Helped Keep the Subscription Vulnerable Online (2025)

remains true to its name.

2. **Delete Administrative Burdens by Connecting Eligibility Databases.** To improve access and reduce administrative burdens, the Commission should streamline the Lifeline enrollment process by connecting state eligibility databases—such as those used for SNAP—to the National Verifier. Automating eligibility verification through these data connections would make enrollment faster, more accurate, and less dependent on paperwork. The Commission should work with states to ensure that all relevant databases are integrated with the National Verifier. The more connections established, the fewer barriers applicants face, effectively "deleting" some of the most cumbersome and time-consuming aspects of the program.

3. **Delete Outdated Restrictions on the Lifeline Benefit.** Connectivity has changed dramatically since Lifeline was established over 40 years ago. Today, full participation in society requires access to both home broadband and mobile data services. To reflect this reality, the Commission should update Lifeline's benefit structure to allow simultaneous support for both fixed broadband and wireless service. The monthly benefit amount should also be increased to account for modern service costs. Additionally, the Commission should explore allowing multiple benefits for qualifying households, such as those with parents and school-aged children who need to communicate while in separate locations.

4. **Delete Barriers to ISP Participation in Lifeline.** To expand the reach of Lifeline, the Commission should reduce barriers that prevent internet service providers (ISP) from participating. Currently, ISPs must obtain an Eligible Telecommunications Carrier (ETC) designation, which is generally granted on a state-by-state basis and can be difficult to secure. This regulatory hurdle discourages provider participation, especially for those looking to offer Lifeline services exclusively. The Commission should establish an alternative federal-level pathway for ISPs who wish to participate solely in Lifeline, enabling broader participation and greater consumer choice.

In conclusion, members of the Lifeline Coalition urge the Commission to take meaningful, lawful steps to strengthen the Lifeline program and ensure it meets the modern connectivity needs of low-income households. With the expiration of the Affordable Connectivity Program, Lifeline stands as the primary federal tool to make communications services affordable for those most at risk of being left behind. To fulfill the Commission's statutory mission of universal service, Lifeline must be streamlined, modernized, and expanded. The proposals outlined above will help ensure that all Americans, regardless of income or geography, can connect to the essential services that shape their lives. As the Commission considers DELETE, DELETE, DELETE, it should remain steadfast to its main priority: DELETE the digital divide.